

August 5, 2022

BY ELECTRONIC TRANSMISSION

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th St., and Constitution Ave., N.W.
Washington, D.C. 20551

Chief Counsel's Office
ATTN: Comment Processing
Office of the Comptroller of the Currency
400 7th Street, S.W., Suite 3E-218
Washington, D.C. 20219

James P. Sheesley, Assistant Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W. Washington, D.C. 20429

RE: Economic Development and Community Reinvestment Act Regulations Docket (R-1769) and RIN (7100-AG29) – Question 13

Dear Ms. Misback:

Enable Ventures (“Enable” or “Fund”) appreciates the opportunity to comment on the proposal by the Board of Governors of the Federal Reserve System for feedback on different approaches to modernizing the regulatory and supervisory framework for the Community Reinvestment Act (CRA).

Enable is writing to respond to the request for feedback on Question 13 from the Notice of Proposed Rulemaking (“NPR”) by urging the Regulating Agencies (OCC, FRB, and FDIC) to retain the ability of banks to receive CRA credit via the “size and purpose test” for lending to or investing in financial intermediaries that finance small businesses with revenue greater than \$5M.

Enable Ventures is the first impact venture capital fund dedicated to closing the disability wealth gap while pursuing market-rate returns. Enable Ventures invests in and helps to scale early-stage companies that leverage disability as an asset and unlock untapped economic potential through products and services powered by universal design. We are a female-led, mission-driven, double-bottom line firm that invests in upskilling workers with disabilities; work-related technology; next generation assistive technology; and founders with disabilities, to drive deep and measurable impact and serve the 1 billion+ person disability population.

CRA banks are an important source of catalytic capital for funds like ours who are advancing concrete approaches to driving measurable social impact while pursuing market-rate returns. The impact we are focused on, under the current regulatory structure, would qualify for CRA bank funding. .

We believe it is crucial to keep the current definition of “size” test standards and to retain and even expand the categories that qualify for “economic development” currently set forth in the CRA Interagency Q&A. Keeping these measures in place and possibly making it easier for bank partners to qualify for CRA credit will continue to lead to significant job creation, revenue generation, and the

continued increase in the hiring and improved economic participation of people with disabilities. Enable Ventures would be happy to provide any additional information helpful to the Board, or to meet in person to discuss.

Sincerely,

A handwritten signature in blue ink that reads "Regina Kline".

Regina "Gina" Kline
Founder & Managing Partner
Enable Ventures
202.330.2173

